



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 16, 2021

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Ronald Romano*, 20 Cr. 585 (ALC)

Dear Judge Carter:

The Government respectfully writes, with the consent of the above-referenced defendant's counsel, to request an adjournment of the status conference, currently scheduled for April 23, 2021, at 11:30 a.m. The Government has been producing discovery on a rolling basis, including a large production of electronic discovery today, April 16, 2021. Accordingly, the parties request a sixty-day adjournment of the status conference. The Government further requests, with the consent of the defendant's attorney, Mark Macron, Esq., that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference. The exclusion of time will enable the Government to complete the production of discovery and the defense time to review that discovery and consider possible motion practice.

Respectfully submitted,

AUDREY STRAUSS
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By: _____
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cc: Mark Macron, Esq.